

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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LIYOU XING,
on his own behalf and on behalf of others similarly situated
Plaintiff,

v.

MAYFLOWER INTERNATIONAL HOTEL GROUP INC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER BUSINESS GROUP, LLC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER INN CORPORATION
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER WENYU LLC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
YAN ZHI HOTEL MANAGEMENT INC.
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
MAYFLOWER 1-1 LLC
d/b/a Mayflower Hotel and
d/b/a Wyndham Garden;
YUEHUA HU,
WEI HONG HU a/k/a Weihong Hu, and
XIAOZHUANG GE

Defendants.
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Case No. 18-cv-06616

**NOTICE OF MOTION FOR
LEAVE TO FILE FIRST
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the annexed Declaration of John Troy, sworn on April 6, 2020, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move this Court, at the United States Courthouse for the Eastern District of New York, at 225 Cadman Plaza East, Brooklyn, NY 11201 before the Honorable Magistrate Judge Lois Bloom for an order granting leave to file a first amended complaint.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Local Rules of Eastern District Court of New York, answering papers, if any, are to be served so as to be received by the undersigned no later than April 20, 2020 and reply papers, if any, are to be served by April 27, 2020.

Dated: Flushing, New York

April 6, 2020

Respectfully submitted,

/s/ John Troy

John Troy, Esq.

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Attorneys for the Plaintiff